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**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Plaintiff,

v.

\$1,106,775.00 IN UNITED STATES  
CURRENCY,

Defendant.

Case No.: 3:20-CV-158-MMD-WGC

**United States of America's Motion to  
Extend Time for Substantive (Merits)  
Response to Claimants' Motion to  
Suppress**

**(First Request)**

**Motion and Memorandum of Points and Authorities**

Plaintiff United States of America moves this Court to extend Plaintiff's time file a substantive (merits) response to Claimants Oak Porcelli's and Gina Pennock's Motion to Suppress. This is the First Request for an extension of time. The filing date of the subject Motion to Dismiss was April 30, 2020, and Plaintiff's response is due on May 14, 2020.

This Motion is made pursuant to Local Rule LR IA 6-1. This Motion is made contemporaneously with, and as a supplement to, Plaintiff's Motion to Stay Claimants' Motion to Suppress and Plaintiff's Procedural Response to Claimant's Motion to Suppress. In those filings, Plaintiff has asked this Court to allow Plaintiff to preserve its opportunity to submit a substantive (merits) response to Claimants' Motion to Suppress. However,

1 Plaintiff is filing this Motion to ensure that its request is made separately and in compliance  
2 with the Local Rules.

3 In this Motion, Plaintiff incorporates by reference the contents of the two filings  
4 being made contemporaneously with this Motion. Plaintiff submits that good cause exists  
5 to extend Plaintiff's time to respond to the substance (merits) of Claimant's Motion to  
6 Suppress. Good cause exists because, for the reasons argued in Plaintiff's other Motion, it  
7 is appropriate to resolve pending issues of standing before addressing the evidentiary and  
8 constitutional issues raised by Claimants in their Motion to Suppress.

9 Accordingly, Plaintiff requests that this Court extend Plaintiff's time to file a  
10 substantive (merits) response to Claimants' Motion to Suppress until (1) the Court has  
11 ruled on Plaintiff's Motion to Stay Claimants' Motion to Suppress and Plaintiff's  
12 Procedural Response to Claimants' Motion to Suppress; and (2) such time, if applicable,  
13 when the Court determines that Plaintiff's substantive (merits) response to Claimants'  
14 Motion to Suppress is warranted.

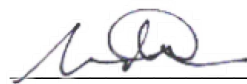
15 Dated this 12th day of May 2020.

16 Respectfully submitted,

17 NICHOLAS A. TRUTANICH  
United States Attorney

18 /s/ James A. Blum  
19 JAMES A. BLUM  
Assistant United States Attorney

20  
21 IT IS SO ORDERED:

22 

23 UNITED STATES DISTRICT JUDGE

24 DATED: May 12, 2020

**CERTIFICATE OF SERVICE**

A copy of the foregoing **United States of America's Motion to Extend Time for Substantive (Merits) Response to Claimants' Motion to Suppress** was served upon counsel of record via Electronic Filing on May 12, 2020

/s/ Maritess Recinto  
MARITESS RECINTO  
Paralegal Specialist  
US Attorney's Office